

APR 16 1993

Ventron/Velsicol
RI/FS Work Plan

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We have reviewed the remedial investigation/feasibility study (RI/FS) work plan for the Ventron/Velsicol site for issues related to environmental resources, and offer the following comments:

1. We are pleased to see that, as was recommended in our November 16, 1988 review memo, a wetland delineation/assessment (Section 2.7), and a Cultural Resources Survey (Section 2.8) will be performed as part of the remedial investigation.
2. As noted in our November 16, 1988 memo, a 100-year and 500-year delineation/assessment must be done to comply with the requirements of Executive Order 11988 (Floodplain Management). This assessment can be done during the FS stage.
3. Pursuant to the requirements of Section 7 of the Endangered Species Act, we will initiate informal consultation with the National Marine Fisheries Service, and the U.S. Fish and Wildlife Service to determine the presence or absence of federally-listed endangered/threatened species on/or in the vicinity of the site. We will keep you informed as to the progress of the consultation process.
4. The site is within the New Jersey coastal zone. Pursuant to the requirements of Section 307 of the Coastal Zone Management Act, an evaluation should be performed during the FS stage to determine if the proposed remedial alternatives are consistent with the New Jersey Coastal Management Program. This evaluation should be submitted to and reviewed by EIB, and used as a basis for making a consistency determination for the site.

Please note that the portion of the coastal zone that is impacted by the site is under the jurisdiction of the Hackensack Meadowlands Development Commission (HMDC). We are currently working with the NJDEPE and the HMDC to refine the procedures for conducting consistency determinations in this part of the State. Accordingly, to ensure that the contractor's coastal zone consistency effort accurately reflects the requirements, I request that we be kept informed as this part of the RI/FS is developed.

5. The section of Berry's Creek, from the confluence with the Hackensack River to south of Route 3, is on the list of rivers eligible to be declared wild, scenic or recreational under the Wild and Scenic Rivers Act (WSRA). Should proposed remedial alternatives include water resource actions (for example, removal of material in the eligible section, significant alteration of the creek's flow or water quality) that result in adverse effects on the characteristics of the creek related to its eligibility under WSRA, we will need to initiate consultation with the National Park Service.

Thank you for this opportunity to comment. We look forward to working with you as this project progresses. If you have any questions, please have Raymond P. Reyes of my staff contacted at x6719.

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